

LAW OFFICE OF

MICHAEL K. BACHRACH

276 FIFTH AVENUE, SUITE 501
NEW YORK, N.Y. 10001

TEL. (212) 929-0592 • FAX. (866) 328-1630

MICHAEL K. BACHRACH*
* admitted in N.Y. and D.C.

<http://www.mbachlaw.com>
michael@mbachlaw.com

April 2, 2012

By ECF

The Honorable Sandra L. Townes
United States District Court Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

***Re: United States v. William F. Boyland, Jr.,
11 Cr. 850 (SLT) (EDNY)***

Dear Judge Townes:

We represent Defendant William F. Boyland, Jr., in the above-referenced matter, and are writing to request a modification of his conditions of release to permit him to travel to Wilson, North Carolina, to spend several days with his family over the next week, specifically, Thursday, April 5, 2012, through Wednesday, April 11, 2012.

Mr. Boyland is presently at liberty on an appearance bond that restricts his travel to the States of New York and New Jersey. However, we are writing to request authorization for Mr. Boyland to travel to, and stay at, his parents' residence in Wilson, North Carolina. The purpose of this request is to allow Mr. Boyland the opportunity to spend the Easter with his family.

Please be advised that we have communicated with Mr. Boyland's Pre-Trial Services Officer, Lourdes Vazquez, as well as with Assistant United States Attorney Lan Nguyen, and neither objects to the instant application.

Respectfully submitted,



Michael K. Bachrach
Richard H. Rosenberg
Attorneys for Defendant William F. Boyland, Jr.

MKB/mb

cc: AUSA Lan Nguyen (by ECF)